

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF,)	
v.)	
)	Case No.: 3:16-cv-00489-CWR-JCG
HINDS COUNTY, ET AL.,)	
)	
DEFENDANTS.)	
_____)	

MOTION TO SEAL EXHIBIT

The United States of America submits this motion to seal Exhibit 4 of its Motion to Show Cause [30], pursuant to Fed. R. 5.2 because the exhibit contains personally identifiable information in addition to other confidential information. The United States submits that production of such information would potentially violate the Privacy Act, Title 5 U.S.C. § 552a, and Title 42 U.S.C. § 1306.

WHEREFORE, the United States requests that the Court SEAL the exhibit.

Respectfully submitted,

FOR THE UNITED STATES:

D. MICHAEL HURST, JR.
United States Attorney
Southern District of Mississippi

ERIC S. DREIBAND
Assistant Attorney General
Civil Rights Division

STEVEN ROSENBAUM
Chief

/s/ Candace G. Mayberry
CANDACE G. MAYBERRY (MS #104014)
MITZI DEASE PAIGE (MS #6014)
Assistant U.S. Attorneys
U.S. Attorney's Office
Southern District of Mississippi
501 E. Court Street – Ste. 4.430
Jackson, MS 39201
candace.mayberry@usdoj.gov
(601) 973-2838
(601) 965-4409 (fax)

Civil Rights Division
Special Litigation Section

/s/ Laura L. Cowall
LAURA L. COWALL (DC # 481379)
Special Counsel
laura.cowall@usdoj.gov
(202) 514-1089
(202) 514-0212 (fax)

/s/ Christopher N. Cheng
CHRISTOPHER N. CHENG (PA #69066)
Trial Attorney
christopher.cheng@usdoj.gov
(202) 514-8892
(202) 514-4883 (fax)

AARON FLEISHER
Trial Attorney
aaron.fleisher@usdoj.gov

United States Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2019, I electronically filed the foregoing United States' Motion to Seal with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/ Candace G. Mayberry
CANDACE G. MAYBERRY (MS #104014)
Assistant U.S. Attorney
U.S. Attorney's Office
Southern District of Mississippi
501 E. Court Street – Ste. 4.430
Jackson, MS 39201
candace.mayberry@usdoj.gov
(601) 973-2838
(601) 965-4409 (fax)